

From: [Dan Peacock](#)
To: [John Hebert](#); [Jennifer Gaines](#); [Russell Wasson](#); [Laura Parsons](#); [Bill Jacobs](#)
Subject: Fw: Questions on brodifacoum product registration conditions
Date: 06/09/2010 08:57 AM

All,

Here is a copy of the E-Mail that I sent to Tom Parshley today.

Daniel B. Peacock, Biologist
Tel: 703-305-5407
Fax: 703-308-0029
E-Mail: peacock.dan@epa.gov

Addresses:
United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

----- Forwarded by Dan Peacock/DC/USEPA/US on 06/09/2010 08:51 AM -----

From: Dan Peacock/DC/USEPA/US
To: <tom.parshley@syngenta.com>
Date: 06/09/2010 08:51 AM
Subject: RE: Questions on brodifacoum product registration conditions

Dear Mr. Parshley,

- We discussed the question about the package sizes allowable for subpackages of Brodifacoum AG (8 lb) products and PCO (16 lb) products internally.
- **For some of your products, you had asked for subpackages as low as one (1) pound.**
- **The decision was that subpackages as low as one (1) lb were acceptable.**
- Originally, I had said that one (1) pound was unacceptable.

Thank You,

Daniel B. Peacock, Biologist
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▼ ---05/04/2010 12:59:17 PM---Dan: E-mail response would be fine. Tom

From: <tom.parshley@syngenta.com>
To: Dan Peacock/DC/USEPA/US@EPA
Date: 05/04/2010 12:59 PM
Subject: RE: Questions on brodifacoum product registration conditions

Dan: E-mail response would be fine.

Tom

-----Original Message-----

From: Peacock.Dan@epamail.epa.gov [mailto:Peacock.Dan@epamail.epa.gov]
Sent: Tuesday, May 04, 2010 12:16 PM
To: Parshley Tom USGR
Subject: Re: Questions on brodifacoum product registration conditions

Tom

I drafted a reply for the subpackage question and got input from staff.
Now I am getting added input and expect comments by Noon Thurs.

How did you want our response: E-Mail or letter?

Thank You,

Daniel B. Peacock, Biologist
Tel: 703-305-5407
Fax: 703-308-0029
E-Mail: peacock.dan@epa.gov

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| From: |
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<tom.parshley@syngenta.com>
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| Dan |
| Peacock/DC/USEPA/US@EPA |
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| Questions on brodifacoum product registration |
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Dan: some more questions have come up as we work to implement the conditions of approval for these risk mitigation decision labels.

100-1052 (Talon G Rodenticide Pellets with Bitrex)

First condition: "The smallest size of subpackage for this product is 2 pounds". This is for an agricultural use situation and we have identified it as such on the label so the ceiling should be 8 lbs, according to the risk mitigation agreements. The container sizes indicate a selling unit of 8 lbs that includes a sub size of 1 lb units that cannot be sold individually but is sold as an 8xl selling unit. Why the 2 pound subpackage limit?

100-1055: The use Restrictions comments in the notice of registration appear to exclude the following statement: "Weatherblok Bait with Bitrex may also be used in transport vehicles (ships, trains, aircraft) and in and around related port or terminal buildings. This product may also be used in alleys and sewers." Was this intentional? If so, why, because the statement was requested to be added by EPA back in 1997.

These are all the questions or loose end issues we found for all of the approvals, so that is pretty much it. Thanks for getting back to me.

Best regards,

Tom

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